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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,

15 Plaintiff,

v.

16 APPROXIMATELY \$25,000.00 IN
U.S. CURRENCY,

Defendant.

CASE NO. 1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jesus
18 Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

19 1. On or about December 1, 2021, claimant filed a claim in the administrative forfeiture
20 proceedings with the Federal Bureau of Investigation with respect to the Approximately \$25,000.00 in
21 U.S. Currency (hereafter “defendant currency”), which was seized on September 2, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
25 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was March 1, 2022.

4 4. By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
7 forfeiture.

8 5. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,
9 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
11 forfeiture.

12 6. By Stipulation and Order filed July 29, 2022, the parties stipulated to extend to September
13 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
15 forfeiture.

16 7. By Stipulation and Order filed September 29, 2022, the parties stipulated to extend to
17 November 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant property and/or to obtain an indictment alleging that the defendant property is
19 subject to forfeiture.

20 8. By Stipulation and Order filed November 29, 2022, the parties stipulated to extend to
21 December 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant property and/or to obtain an indictment alleging that the defendant property is
23 subject to forfeiture.

24 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
25 to January 27, 2023, the time in which the United States is required to file a civil complaint for forfeiture
26 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
27 subject to forfeiture.

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1 10. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to January 27, 2023.

4 Dated: December 20, 2022

PHILLIP A. TALBERT
United States Attorney

6 /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

9 Dated: December 20, 2022

10 /s/ Julissa Echevarria
11 JULISSA ECHEVARRIA
ROBERT L. FORKNER
12 Attorneys for potential claimant
Jesus Pedro Maldonado Ceja
(As approved by email on 12/20/22)

13 IT IS SO ORDERED.

14 Dated: December 21, 2022


15 UNITED STATES DISTRICT JUDGE